

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF TENNESSEE**  
**AT KNOXVILLE**

M.B., et al., )  
                        )  
Plaintiff,         )  
                        )  
v.                   )              **No. 3:21-CV-317**  
                        )  
GOVERNOR BILL LEE, et al. )  
                        )  
Defendant.         )

**KCBOE'S RESPONSE TO PROPOSED INTERVENTION BY**  
**M.M., E.M., AND D.M**

Comes Now Knox County Board of Education (“KCBOE”), by and through undersigned counsel, respectfully submits this Response to the Motion to Intervene [Doc. 115] filed on behalf of Proposed Intervening Defendants M.M., E.M., and D.M. In response to such Motion, KCBOE states that for the reasons set forth in its Answer, namely that Plaintiffs have failed to join one or more necessary parties to this litigation, KCBOE does not object to the intervention.

Respectfully submitted,

s/David M. Sanders  
David M. Sanders (BPR # 016885)  
Amanda Lynn Morse (BPR # 032274)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was filed electronically on the date recorded by the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular United States Mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

s/\_\_\_\_\_  
David M. Sanders